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*Attorney for Objector William Thomas Haynes,
as trustee for the benefit of W Thomas and Katherine Haynes
Irrevocable Trust for the benefit of Sara L. Haynes*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**IN RE PETROBRAS SECURITIES
LITIGATION**

Case No. 14-CV-9662 (JSR)

CLASS ACTION

DECLARATION OF ANNA ST. JOHN

I, Anna St. John, declare as follows:

1. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. My business address is Competitive Enterprise Institute, 1310 L Street NW, 7th Floor, Washington, DC 20005. My telephone number is (917) 327-2392. My email address is anna.stjohn@cei.org.

3. I represent William Thomas Haynes in his capacity as the trustee of the W Thomas and Katherine Haynes Irrevocable Trust for the benefit of Sara L. Haynes (the “Trust”), a class member in this matter.

4. In March 2015, I began work with the non-profit Center for Class Action Fairness (“CCAF”), which subsequently merged into the non-profit Competitive Enterprise Institute. Prior to joining CCAF, I had not appeared as a settlement objector or as counsel to an objector. All cases in which I have appeared as a settlement objector or as counsel to an objector are listed in the chart set forth in paragraph 11 of the Declaration of Theodore H. Frank.

5. The combined total lodestar of \$159,496,169.50 includes time for three law firms: Pomerantz LLP, Motley Rice LLC and Labaton Sucharow LLP. Dkt. 789-19. The Pomerantz LLP law firm utilized project associates that were only admitted in Brazil. Dkt. 789-2 at 6-21. The other two firms used attorneys admitted in the United States. Dkts. 789-18 at 11-16; 789-17 at 56-65. Below is a table of the reported lodestar for the Pomerantz project associates whose only bar admission listed is Brazil (Dkts. 789-16 and 789-23):

Pomerantz Project Associate	Hours	Rate	Lodestar (Dkt. 789-16 at 3-7)	Bar/Admission (Dkt. 789-23 at 6-21)
Meskelis, W.	2,507.50	\$625.00	\$1,567,187.50	Brazil/2000
Azevedo, C.	1,744.20	\$625.00	\$1,090,125.00	Brazil
Espindola, M.	2,693.25	\$550.00	\$1,481,287.50	Ordem dos Advogados do Brasil - OAB, SP (Brazil)
Condini, A.	3,815.58	\$550.00	\$2,098,569.00	Brazil
Campos-Rocha, N.	1,985.50	\$550.00	\$1,092,025.00	Brazil/2009; Portuguese Bar Association/2014

Wood, S.	2,223.00	\$550.00	\$1,222,650.00	Brazil
Dos Santos, T.	2,357.15	\$550.00	\$1,296,432.50	OAB/Rio de Janeiro (Brazil)/2005
Graham, M.	2,191.05	\$550.00	\$1,205,077.50	Brazil
Mackey, M.	1,966.20	\$550.00	\$1,081,410.00	Brazil/2003
Orcicano, A.	2,474.60	\$550.00	\$1,361,030.00	Brazil
Lanza, D.	2,748.00	\$550.00	\$1,511,400.00	Brazil/2011
Menezes, J.	1,858.00	\$550.00	\$1,021,900.00	Brazil
Lattea, F.	1,778.77	\$550.00	\$978,323.50	Brazil/2003
Klein, A.	2,443.60	\$450.00	\$1,099,620.00	Brazil
Oliveira-Gonzalez, A.	1,529.50	\$450.00	\$688,275.00	Brazil/2010
Froes-Howard, R.	1,501.00	\$450.00	\$675,450.00	Brazil/2004
Barros, I.	1,255.60	\$450.00	\$565,020.00	Brazil
Conrad, S.	1,185.00	\$450.00	\$533,250.00	The Bar Association of the Brazilian Lawyers) OAB -
De Jesus, F.	2,716.32	\$450.00	\$1,222,344.00	Brazil
Moraes, V.	1,278.50	\$450.00	\$575,325.00	Brazil/2006
Nemecek, M.	2,065.00	\$450.00	\$929,250.00	Brazil
Neto, O.	2,554.50	\$450.00	\$1,149,525.00	Brazil 2011
Oliveira, C.	2,135.00	\$450.00	\$960,750.00	Brazil/2009
Solot, L.	2,087.50	\$450.00	\$939,375.00	Brazil/2011
De Martin, C.	401.7	\$450.00	\$180,765.00	Brazil/2012
Costa, D.	2,135.50	\$350.00	\$747,425.00	Brazil (Piaui State)/2012
Gastmann, N.	1,667.00	\$350.00	\$583,450.00	Brazil (OAB/RS)/2013
TOTAL	55,298.20		\$27,857,241.50	

It is unclear whether the Project Associates licensed only in Puerto Rico, *see* Dkt. 789-23, would be capable of being admitted *pro hac vice* and thus they are not included with the Brazilian attorneys but included in the Table below of other project associates. There were two American attorneys (Domingo Lopez and May Fernandes) for which class counsel did not identify any bar admission, Dkt. 789-23 at 23, 24, that may also be unable to receive legal fees if they are unable to seek admission, but are conservatively included in the Table below of other project associates. Project associate Patricia Merlini's bar status is described as "NJ Bar pending," Dkt. 789-23 at 25, but the bulk of the document review was performed two years ago, Dkt. 789-22; while she may

also be unable to recover attorneys' fees, she is also included in the Table below of other project associates.

6. Table of other project associates excluding the Brazil admission-only associates listed in the Table in paragraph 5 above (Dkt. 789-16):

Pomerantz Project Associate	Hours	Rate	Lodestar (Dkt. 789-16 at 3-7)
Dean, J.	2,167.75	\$635.00	\$1,376,521.25
Sherman, H.	781.50	\$625.00	\$488,437.50
Guglielmelli, J.	610.00	\$625.00	\$381,250.00
Crain, C.	1,799.50	\$625.00	\$1,124,687.50
Sosa Marquez, M.	1,915.80	\$550.00	\$1,053,690.00
Ocasio, M.	760.00	\$550.00	\$418,000.00
Barcarcel, S.	268.50	\$550.00	\$147,675.00
Lucente, J.	1,629.60	\$550.00	\$896,280.00
Memnon, C.	840.00	\$550.00	\$462,000.00
Aquino, A.	1,160.75	\$550.00	\$638,412.50
Penson, L.	1,842.50	\$550.00	\$1,013,375.00
Rickman, J.	2,632.75	\$550.00	\$1,299,512.50
DePhillips, S.	631.40	\$550.00	\$347,270.00
Gallego, E.	1,765.50	\$550.00	\$971,025.00
Sherman, L.	1,657.25	\$550.00	\$911,487.50
Iguina, C.	2,117.25	\$550.00	\$1,164,487.50
Borges, D.	2,289.50	\$550.00	\$1,259,225.00
Jose, M.	906.45	\$550.00	\$498,547.50
Martins, D.	906.85	\$550.00	\$498,767.50
Naranjo, L.	1,147.00	\$550.00	\$630,850.00
Nebot Alonso, A.	1,170.00	\$550.00	\$643,500.00
Newman, Norvella	667.06	\$550.00	\$366,883.00
Parente, M.	2,328.36	\$550.00	\$1,280,598.00
Pollard, C.	1,854.00	\$550.00	\$1,019,700.00
Rodriguez, J.	293.50	\$550.00	\$161,425.00
Santos-Tricoch, R.	934.00	\$550.00	\$513,700.00
Wasung, P.	1,191.50	\$550.00	\$655,325.00
Duverger, F.	1,485.00	\$550.00	\$816,750.00
Friend, M.	758.00	\$550.00	\$416,900.00
De la Cruz, J.	2,376.30	\$550.00	\$1,306,965.00
Freund, A.	2,331.30	\$550.00	\$1,282,215.00
Chaves, M.	741.00	\$550.00	\$407,550.00
Trieff, D.	1,537.50	\$550.00	\$845,625.00

Rudman, A.	453.20	\$550.00	\$249,260.00
Braswell, M.	2,002.45	\$550.00	\$1,101,347.50
Sidi, S.	1,249.25	\$550.00	\$687,087.50
Paternoster, M.	638.00	\$550.00	\$350,900.00
Valenti, R.	1,604.50	\$550.00	\$882,475.00
Neu-Stoppelman, M.	1,249.00	\$525.00	\$655,725.00
Barros, A.	2,133.65	\$550.00	\$1,173,507.50
Vazquez Cognet, J.	1932.00	\$450.00	\$869,400.00
Guadalupe Baerga, A.	686.50	\$450.00	\$308,925.00
Herrera, J.	2,216.00	\$450.00	\$997,200.00
King, S.	367.90	\$450.00	\$165,555.00
Nascimento, J.	1,109.00	\$450.00	\$499,050.00
Jaffe, A.	190.00	\$450.00	\$85,500.00
Rodriguez, H.	1,036.00	\$450.00	\$466,200.00
Schiappa, M.	1,967.10	\$450.00	\$885,195.00
Villagra, H.	437.50	\$450.00	\$196,875.00
Vivo, K.	389.75	\$450.00	\$175,387.50
DuBois, D.	2,124.05	\$450.00	\$955,822.50
Elayan-Martinez, A.	1,829.10	\$450.00	\$823,095.00
Davila, G.	269.00	\$450.00	\$121,050.00
Sriken, L.	2,994.50	\$450.00	\$1,347,525.00
Favila, M.	190.00	\$450.00	\$85,500.00
Bastos, C.	1,765.50	\$450.00	\$794,475.00
Chaves, A.	939.92	\$450.00	\$422,964.00
De Jesus, L.	1,672.00	\$450.00	\$752,400.00
Ferreiro, M.	1,080.65	\$450.00	\$486,292.50
Villacreses, F.	2,090.50	\$450.00	\$940,725.00
Gallagher, S.	1,952.50	\$450.00	\$878,625.00
Gomez, L.	1,920.00	\$450.00	\$864,000.00
Steiner, A.	292.50	\$450.00	\$131,625.00
Small, H.	1,042.50	\$450.00	\$469,125.00
Prado, J.	2,278.25	\$450.00	\$1,025,212.50
Bates, A.	270.30	\$450.00	\$121,635.00
Ampudia, R.	1,725.25	\$450.00	\$776,362.50
Hosen, M.	2,384.50	\$450.00	\$1,073,025.00
Ortiz, R.	239.50	\$450.00	\$107,775.00
Rivera, S.	309.25	\$450.00	\$139,162.50
Leal, B.	129.25	\$450.00	\$58,162.50
Lee, E.	1,665.20	\$450.00	\$749,340.00
Licandro, I.	394.00	\$450.00	\$177,300.00
Luce, P.	388.25	\$450.00	\$174,712.50

Malphurs, J.	1,702.00	\$450.00	\$765,900.00
Molina, F.	2,286.00	\$450.00	\$1,028,700.00
Hansen, P.	722.00	\$450.00	\$324,900.00
Jones, S.	1,626.50	\$450.00	\$731,925.00
Uwisavye, N.	287.35	\$450.00	\$129,307.50
Orozco, L.	2,331.25	\$450.00	\$1,049,062.50
Verdun, A.	807.00	\$450.00	\$363,150.00
Geller, A.	1,538.25	\$450.00	\$692,212.50
Oliveira, F.	2,045.00	\$450.00	\$920,250.00
Lang, N.	966.60	\$450.00	\$434,970.00
Mayer, M.	1,987.50	\$450.00	\$894,375.00
Mitchell, J.	1,848.50	\$450.00	\$831,825.00
Kennedy, S.	491.00	\$450.00	\$220,950.00
Kim, H.	286.00	\$450.00	\$128,700.00
Guerra Perez, C.	1,767.75	\$450.00	\$795,487.50
Ruiz, D.	1,278.20	\$450.00	\$575,190.00
Doyle, D.	1,964.50	\$450.00	\$884,025.00
Galbes, F.	2,559.05	\$450.00	\$1,151,572.50
Fuardo, C.	2,024.25	\$450.00	\$910,912.50
Varajoa, N.	661.00	\$350.00	\$231,350.00
Fortunato, M.	866.25	\$350.00	\$303,187.50
Devereaux, J.	2030.50	\$350.00	\$710,675.00
Geller, N.	1,305.00	\$350.00	\$456,750.00
Robinson, D.	121.00	\$350.00	\$42,350.00
Rodrigues, L.	2,256.00	\$350.00	\$789,600.00
Rodriguez, G.	2,209.00	\$350.00	\$733,150.00
Pitarch, R.	1,745.00	\$350.00	\$610,750.00
Montanez, M.	750.50	\$350.00	\$262,675.00
Montoya, C.	2,141.50	\$350.00	\$749,525.00
Lee, I.	302.74	\$350.00	\$105,959.00
Jones, T.	403.60	\$350.00	\$141,260.00
Bensimon, A.	835.00	\$350.00	\$292,250.00
Britto, G.	704.00	\$350.00	\$246,400.00
Alfonso, M.	2,457.50	\$350.00	\$860,125.00
Barone, S.	520.44	\$350.00	\$182,154.00
Knighten, C.	1,913.50	\$350.00	\$669,725.00
Gonzalez, J.	2,298.25	\$350.00	\$804,387.50
Lopez, D.	1,938.10	\$350.00	\$678,335.00
Clemente, R.	1,233.00	\$350.00	\$431,550.00
Marin, D.	502.00	\$350.00	\$175,700.00
McLaughlin, T.	510.00	\$350.00	\$178,500.00

Johnson, K.	812.25	\$350.00	\$284,287.50
Condarco, C.	776.00	\$350.00	\$271,600.00
Aduayi, N.	1,124.25	\$350.00	\$393,487.50
Guzman, J.	2,187.50	\$350.00	\$765,625.00
Serrano Mercado, A.	851.50	\$350.00	\$298,025.00
Lima, J.	2,204.00	\$325.00	\$716,300.00
Fernandes, M	1,101.00	\$325.00	\$357,825.00
Meza, E.	32.00	\$325.00	\$10,400.00
Norris, A.	752.00	\$325.00	\$244,400.00
Johnson, G.	901.25	\$325.00	\$292,906.25
Klopman, A.	1,051.50	\$325.00	\$341,737.50
Israel, R.	1,238.00	\$325.00	\$402,350.00
Adam, V.	1,854.50	\$325.00	\$602,712.50
Cassamassina, D.	2,065.50	\$325.00	\$671,287.50
Holland, M.	2,142.25	\$325.00	\$696,231.25
Heicklen, A.	879.50	\$325.00	\$285,837.50
Risenmay, R.	1,847.25	\$325.00	\$600,356.25
Saint Vitus, T.	1,644.00	\$325.00	\$534,300.00
Sena, J.	1,697.75	\$325.00	\$551,768.75
Urena, Y.	864.00	\$325.00	\$280,800.00
Merlini, P.	1,873.50	\$325.00	\$608,887.50
De Jesus, E.	754.25	\$325.00	\$245,131.25
Vaklinov, E.	815.50	\$325.00	\$265,037.50
Lorenzo, J.	3,066.25	\$325.00	\$996,531.25
TOTAL Pomerantz	183,863.72		\$80,999,811.75
Motley Rice Project Associate	Hours	Rate	Lodestar (Dkt. 789-18 at 6)
Coltrin, Benjamin	616.35	\$350.00	\$215,722.50
Hirsch, Georg F.	8.00	\$450.00	\$3,600.00
Hulet Cuiara, Kaycee	446.30	\$450.00	\$200,835.00
Mills, Rachel	657.80	\$350.00	\$230,230.00
Profeta, Joseph	694.10	\$450.00	\$312,345.00
Richards, Heidi E.	528.20	\$450.00	\$237,690.00
TOTAL Motley Rice	2,950.75		\$1,200,422.50
TOTAL Project Associates	186,814.47		\$82,200,234.25

The above table does not include attorneys from Labaton Sucharow LLP. Labaton's lodestar did not include time for "project associates" but included time for associates and staff attorneys; because Labaton did not include billing summaries or any description of the work performed by

these attorneys, those attorneys were excluded from the above table because it is unclear whether they were contract attorneys similar to the other project associates. Dkt. 789-17 at 7-8. If these attorneys were contract attorneys performing low-level document review like the other project associates, the total lodestar is further overstated for the \$350 to \$625 hourly rates reported for those attorneys. *See id.*

7. Post-*Goldberger* courts no longer commonly countenance multipliers in the 3-4.5 range. *E.g., In re Platinum and Palladium Commodities Litig.*, 2015 WL 4560206, at *4 (S.D.N.Y. Jul. 7, 2015) (rejecting 2.6 multiplier; applying 1.9); *In re Citigroup Inc. Secs. Litig.*, 965 F. Supp. 2d 369, 401 (S.D.N.Y. 2013) (rejecting 3.9 multiplier; applying 2.8 as “high but not excessive”); *In re Wachovia Preferred Securities & Bond/Notes Litig.*, 2012 WL 2589230 (S.D.N.Y. Jan. 3, 2012) (rejecting 3.35 multiplier; applying 2.3); *In re Currency Conversion Fee Antitrust Litig.*, 263 F.R.D. 110 (S.D.N.Y. 2009) (rejecting 2.69 multiplier; applying 1.6); *In re Merrill Lynch & Co., Inc. Research Reports Secs. Litig.*, 2007 WL 313474, at *23-*24 (S.D.N.Y. Feb. 1, 2007) (rejecting 2.43 multiplier; applying 1.95); *In re Twinlab Corp. Sec. Litig.*, 187 F. Supp. 2d 80, 87 (E.D.N.Y. 2002) (rejecting 3.58 multiplier; applying 1.3).

8. Court have applied *Perdue v. Kenny A.*, 559 U.S. 542 (2010), with respect to the reasonableness of class action fee awards made under Fed. R. Civ. P. 23(h). *See In re Hyundai and Kia Fuel Economy Litig.*, 881 F.3d 679, 706-07 (9th Cir. 2018) (applying *Kenny A.* to Rule 23(h) fee award pursuant to settlement); *In re Sears Roebuck & Co. Front-Loading Washer Prods. Liab. Litig.*, 867 F.3d 791 (7th Cir. 2017) (applying *Kenny A.* to reduce 1.75 multiplier to 1); *In re Pet Food Prods. Liab. Litig.*, 629 F.3d 333, 361 (3d Cir. 2010) (Weis, J. concurring/dissenting) (referring to *Kenny A.* as an “analogous statutory fee-shifting case.”); but see *In re BioScrip, Inc. Secs. Litig.*, 273 F. Supp. 3d 474 (S.D.N.Y. 2017) (declining to apply *Kenny A.* to common fund settlement fee awards).

9. Table of cases extracted from Exhibit 15 to the Declaration of Jeremy A. Lieberman (Dkt. 789-15) to include only in-Circuit securities cases:

Securities & In-Circuit Cases	Fund Size (in billions)	Fee %
WorldCom	6.1	5.5
AoL Time Warner	2.6	5.9
BoA/Merrill	2.4	6.28
Credit Default Swaps	1.9	13.61
Nortel II	1.3	8
Nortel I	1.1	3
Median Fee		6.09%

10. A true and correct copy of a “print to PDF” of an attorney job listing posted on the website glassdoor.com, located using the search terms “portuguese document review” on May 10, 2018, is attached hereto as Exhibit 1.

11. A true and correct copy of a “print to PDF” of an attorney job listing posted on the website glassdoor.com, located using the search terms “portuguese document review” on May 10, 2018, is attached hereto as Exhibit 2.

12. A true and correct copy of a “print to PDF” of an attorney job listing posted on the website glassdoor.com, located using the search terms “portuguese attorney” on May 10, 2018, is attached hereto as Exhibit 3.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 10, 2018, in New Orleans, LA.

/s/ Anna St. John
Anna St. John